

United States District Court
Southern District of New York
United States of America x

Case No. 19CR547(cs)

Plaintiff

v.

Mehdi Moslem & Saaed Moslem

Defendants

Motion For Subpeona Support

AFFIDAVIT

Now comes Saaed Moslem, respectfully moving this Court to issue subpoenas, requesting emails from the Moslem's previous retained counsels, in this criminal matter. As a paid in full client of counsel's, all emails between each other, the AUSA's or any other relevant party, are work product of the Moslems.

The Moslems have been requesting, on numerous occasions, these documents from June, 2021, with no answer or acknowledgement. The Moslem's went as far as filing a grievance with the Attorney Grievance Committee in February 2022. (Exhibit A, copy of grievances) with still no answer, or production of documents to present.

With clear and convincing evidence of defense counsel's gross neglect and malpractice, in addition to prosecutorial misconduct. (see motion filed ECF #175), issuance of these subpoenas are a must in the interest of justice. As the Court stated, *U.S. v. Nixon*,

418 U.S. 683,700, 94 S.Ct. 3090, 41 L.Ed.2d 1039 (1974)

1) Relevancy- For preparation of sentencing hearing, all communications regarding loss calculations, and the accuracy of information provided by Strauhs, and the government.

2) Admissibility- Documents will be used in preparation of the sentencing hearing, to be sure that all information be accurately purported. In addition having again having demonstrated gross neglect and malpractice in defense counsel's actions.

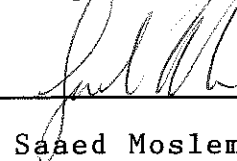
3) Specificity- All emails between each other, AUSA's, or any other relevant party, regarding Mehdi and/or Saaed Moslem.

Having cleared the " three hurdles" 1)relevancy 2) admissibility 3)Specificity for the subpeonas, Saaed Moslem prays that this motion will be granted.

Dated: Valhalla, N.Y.

6/28/22

Respectfully Submitted,



Saaed Moslem

UNITED STATES DISTRICT COURT

for the

Southern District of New York

United States of America

v.

Case No. 19cr547(CS)

~~Mehdi Moslem & Saaed Moslem~~
DefendantSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR
OBJECTS IN A CRIMINAL CASETo: Marc Antony Agnifalo 256 Fifth Ave Ste 2nd FLR New York, NY10001
Brafman & Associates P.C. 917-399-9742 Magnifilo@Braflaw.com
(Name of person to whom this subpoena is directed)

YOU ARE COMMANDED to produce at the time, date, and place set forth below the following books, papers, documents, data, or other objects: All Emails regarding Mehdi and/or Saaed Moslem,

Please provide on or before 7/8/22

Place: US COURTHOUSE

Date and Time: 8/31/22 9:30am

300 Quarropas Street

White Plains, NY 10601

Certain provisions of Fed. R. Crim. P. 17 are attached, including Rule 17(c)(2), relating to your ability to file a motion to quash or modify the subpoena; Rule 17(d) and (e), which govern service of subpoenas; and Rule 17(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

(SEAL)

Date: _____

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the attorney representing (name of party) Mehdi &
Saaed Moslem PO BOX 10 Valhalla, NY 10595, who requests this subpoena, are:
TAGHAVISAEIDEH@GMAIL.COM 917-892-4364

Notice to those who use this form to request a subpoena

Before requesting and serving a subpoena pursuant to Fed. R. Crim. P. 17(c), the party seeking the subpoena is advised to consult the rules of practice of the court in which the criminal proceeding is pending to determine whether any local rules or orders establish requirements in connection with the issuance of such a subpoena. If no local rules or orders govern practice under Rule 17(c), counsel should ask the assigned judge whether the court regulates practice under Rule 17(c) to 1) require prior judicial approval for the issuance of the subpoena, either on notice or ex parte; 2) specify where the documents must be returned (e.g., to the court clerk, the chambers of the assigned judge, or counsel's office); and 3) require that counsel who receives produced documents provide them to opposing counsel absent a disclosure obligation under Fed. R. Crim. P. 16.

Please note that Rule 17(c) (attached) provides that a subpoena for the production of certain information about a victim may not be issued unless first approved by separate court order.

AO 89B (07/16) Subpoena to Produce Documents, Information, or Objects in a Criminal Case

UNITED STATES DISTRICT COURT

for the

SOUTHERN District of NEW YORK

United States of America)

v.)

) Case No. 19CR547(CS)

MEHDI MOSLEM & SAAED MOSLEM)

Defendant)

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR
OBJECTS IN A CRIMINAL CASE**

To: ZACH INTRATER 256 FIFTH AVE STE 2ND FLR NEW YORK, NY 10001
BRAFMAN & ASSOCIATES P.C. ZACH.INTRATER@OUTLOOK.COM
917-721-7331 (Name of person to whom this subpoena is directed)

YOU ARE COMMANDED to produce at the time, date, and place set forth below the following books, papers, documents, data, or other objects: ALL EMAILS REGARDING MEHDI AND/OR SAAED

MOSLEM, PLEASE PROVIDE ON OR BEFORE 7/8/22

Place: US COURTHOUSE

Date and Time: 8/31/22 9:30am

300 QUARROPAS STREET

WHITE PLAINS, NY 10601

Certain provisions of Fed. R. Crim. P. 17 are attached, including Rule 17(c)(2), relating to your ability to file a motion to quash or modify the subpoena; Rule 17(d) and (e), which govern service of subpoenas; and Rule 17(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

(SEAL)

Date: _____

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the attorney representing (name of party) mMEHDI &
SAAED MOSLEM PO BOX 10 VALHALLA, NY 10595, who requests this subpoena, are:
TAGHAVISAEIDEH@gmail.com 917-892-4364

Notice to those who use this form to request a subpoena

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AO 89B (07/16) Subpoena to Produce Documents, Information, or Objects in a Criminal Case

UNITED STATES DISTRICT COURT

for the

SOUTHERN District of NEW YORK

United States of America)

v.)

) Case No. 19CR547(CS)

~~MEHDI MOSLEM & SAAED MOSLEM~~)

Defendant)

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR
OBJECTS IN A CRIMINAL CASE**

To: MATIN EMOUNA 100 Garden City Plaza Suite 520 Garden City, NY
11530 MEMOUNA@EMIKLAW.COM 516-877-9111

(Name of person to whom this subpoena is directed)

YOU ARE COMMANDED to produce at the time, date, and place set forth below the following books, papers, documents, data, or other objects: ALL EMAILS REGARDING MEHDI AND/OR SAAED MOSLEM,

PLEASE PROVIDE ON OR BEFORE 7/8/22

Place: US COURTHOUSE

Date and Time: 8/31/22 9:30am

300 QUARROPAS STREET

WHITE PLAINS, NY 10601

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(SEAL)

Date:

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the attorney representing *(name of party)* MEHDI &
SAAED MOSLEM PO BOX 10 VALHALLA, NY 10595, who requests this subpoena, are:
TAGHAVISAEIDEH@GMAIL.COM 917-892-4364

Notice to those who use this form to request a subpoena

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UNITED STATES DISTRICT COURT

for the

SOUTHERN District of NEW YORK

United States of America)

v.)

Case No. 19CR547 (CS)

MEHDI MOSLEM & SAAED MOSLEM)

Defendant)

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR
OBJECTS IN A CRIMINAL CASE

To: BENJAMIN OSTRER 111 MAIN STREET CHESTER, NY 10918

OSTREBEN@AOL.COM 845-469-7577

(Name of person to whom this subpoena is directed)

YOU ARE COMMANDED to produce at the time, date, and place set forth below the following books, papers, documents, data, or other objects: ALL EMAILS REGARDING MEHDI AND/OR SAAED MOSLEM,

PLEASE PROVIDE ON OR BEFORE 7/8/22

Place: US COURTHOUSE

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300 QUARROPAS STREET

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Date: _____

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Signature of Clerk or Deputy Clerk

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PO BOX 10 VALHALLA, NY 10595, who requests this subpoena, are:

TAGHAVISAEIDEH@GMAIL.COM

917-892-4364

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UNITED STATES DISTRICT COURT

for the

SOUTHERN District of NEW YORK

United States of America)

v.)

Case No. 19CR547(CS)

MEHDI MOSLEM & SAAED MOSLEM)
Defendant)SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR
OBJECTS IN A CRIMINAL CASETo: RICHARD D WILLSTATTER 200 MAMARONECK AVE SUITE 605 White Plains,
NY, 10601 914-948-5656 WILLSTATTER@MSN.COM
(Name of person to whom this subpoena is directed)YOU ARE COMMANDED to produce at the time, date, and place set forth below the following books, papers,
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PLEASE PROVIDE ON OR BEFORE 7/8/22

Place: US COURTHOUSE

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WHITE PLAINS, NY 10601

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(SEAL)

Date:

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EXHIBIT A

(Rev. 7.30.2020)

ATTORNEY GRIEVANCE COMMITTEE
 Supreme Court, Appellate Division
 First Judicial Department
 180 Maiden Lane, 17th Floor
 New York, New York 10038
 (212) 401-0800

JORGE DOPICO
Chief Attorney

Email Complaint and Attachments to: AD1-AGC-newcomplaints@nycourts.gov. In addition, please send **one copy** of your complaint and attachments **by regular mail** to the above address. (If you do not have a personal email account, please send two (2) complete sets of your complaint and all attachments. There may be a delay in processing your matter if it is not emailed. Please **do not** include any original documents because we are unable to return them.)

Background Information

Today's Date: 2/22/22
 Your Full Name: (Mr. Ms. Mrs.) Saeed Moslem
 Address: PO Box 10
 City: Valhalla State: Ny Zip Code: 10595
 Cell Phone: N/A Business/Home Phone: N/A
 Email Address: saeedmoslem@hotmail.com
 Are you represented by a lawyer regarding this complaint? Yes ☐ No ☒ If Yes:
 Lawyer's Name: _____
 Address: _____
 City: _____ State: _____ Zip Code: _____
 Business Phone: _____ Cell Phone: _____

Attorney Information

Full Name of Attorney Complained of: (Mr. Ms. Mrs.) Zach Intrater
 Address: 256 Fifth Ave Ste 2nd flr
 City: New York State: New York Zip Code: 10001
 Business Phone: _____ Cell Phone: _____
 Email Address: zach.intrater@outlook.com

Date(s) of Representation/Incident: Jan 2021Have you filed a civil or criminal complaint against this attorney? Yes ☐ No ☒ If Yes:

If yes, name of case (if applicable): _____

Name of Court: Southern District Ny Federal Court White PlainsIndex Number of Case (if known): 19 CR 547Have you filed a complaint concerning this matter with another Grievance Committee, Bar Association, District Attorney's Office, or any other agency? Yes ☐ No ☒

If yes, name of agency: _____

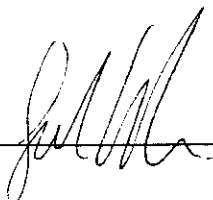
Action taken by agency, if any: _____

Details of Complaint

Please describe the alleged misconduct in as much detail as possible including what happened, where and when, the names of any witnesses, what was said, and in what tone of voice, etc. Use additional sheets if necessary.

Have requested all email correspondence regarding mehdi/ and or Saeed Moslem regarding criminal case, and have never recieved anything. I want all correspondence with other attornies, and or AVSA's, and any other relevant persons. Including but not limited to Zach intrater, Elias Schwa, martin emonna, richard willstatter, ben oster, Alison drew, Timothy parlature, Daniel loss, James McMahon, Nicolas Bradley, and any other parties. All email communications, attachments, drafts, or deleted emails. Need to know what was said in, me and my fathers defense in criminal case.

Complainant's Signature (Required):



(Rev. 7.30.2020)

ATTORNEY GRIEVANCE COMMITTEE

Supreme Court, Appellate Division
 First Judicial Department
 180 Maiden Lane, 17th Floor
 New York, New York 10038
 (212) 401-0800

JORGE DOPICO**Chief Attorney**

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Background InformationToday's Date: 2/22/22Your Full Name: (Mr. Ms. Mrs.) Saeed MoslemAddress: PO Box 10City: Valhalla State: Ny Zip Code: 10595Cell Phone: N/A Business/Home Phone: N/AEmail Address: saeed.moslem@hotmail.comAre you represented by a lawyer regarding this complaint? Yes ☐ No ☒ If Yes:

Lawyer's Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Business Phone: _____ Cell Phone: _____

Attorney InformationFull Name of Attorney Complained of: (Mr. Ms. Mrs.) Marc Antony AgnifaloAddress: 256 Fifth Ave Ste 2nd FlrCity: New York State: New York Zip Code: 10001

Business Phone: _____ Cell Phone: _____

Email Address: magnifilo@braflaw.com

Date(s) of Representation/Incident: Jan 2021Have you filed a civil or criminal complaint against this attorney? Yes ☐ No ☒ If Yes:

If yes, name of case (if applicable): _____

Name of Court: Southern District Ny Federal Court White PlainsIndex Number of Case (if known): 19 CR 547Have you filed a complaint concerning this matter with another Grievance Committee, Bar Association, District Attorney's Office, or any other agency? Yes ☐ No ☒

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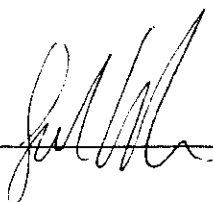
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Complainant's Signature (Required):



(Rev. 7.30.2020)

ATTORNEY GRIEVANCE COMMITTEE

Supreme Court, Appellate Division
 First Judicial Department
 180 Maiden Lane, 17th Floor
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JORGE DOPICO
Chief Attorney

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Background Information

Today's Date: 2/22/22

Your Full Name: (Mr. Ms. Mrs.) Mehdi Moslem

Address: PO Box 10

City: Valhalla State: Ny Zip Code: 10595

Cell Phone: N/A Business/Home Phone: N/A

Email Address: Snaed moslem@hotmail.com

Are you represented by a lawyer regarding this complaint? Yes ☐ No ☒ If Yes:

Lawyer's Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Business Phone: _____ Cell Phone: _____

Attorney Information

Full Name of Attorney Complained of: (Mr. Ms. Mrs.) Matin Emoung

Address: 100 Garden City Plaza Suite 520

City: Garden City State: Ny Zip Code: 11530

Business Phone: 516-877-9111 Cell Phone: N/A

Email Address: memoung@emiklaw.com

Date(s) of Representation/Incident: Jan 2021Have you filed a civil or criminal complaint against this attorney? Yes ☐ No ☒ If Yes:

If yes, name of case (if applicable): _____

Name of Court: Southern District NY Federal Court White PlainsIndex Number of Case (if known): 19 CR 547Have you filed a complaint concerning this matter with another Grievance Committee, Bar Association, District Attorney's Office, or any other agency? Yes ☐ No ☒

If yes, name of agency: _____

Action taken by agency, if any: _____

Details of Complaint

Please describe the alleged misconduct in as much detail as possible including what happened, where and when, the names of any witnesses, what was said, and in what tone of voice, etc. Use additional sheets if necessary.

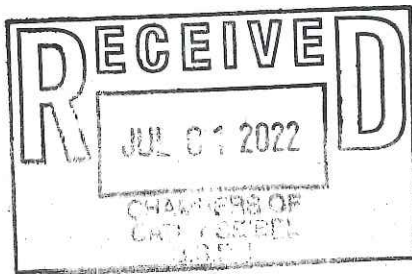
Have requested all email correspondence regarding mehd: /and or Saeed Moslem regarding criminal case, and have never recieved anything. I want all correspondence with other attorneys, and or AUSA's and any other relevant persons. Including but not limited to Zach Intrater, Elias Schwartz, Marc Agnifalo, martin emouna, Richard willstatter, Ben osterer, Alison drew, Timothy Parkatore, Daniel bos, James McMahon, Nicolas Bradley, and any other parties. All email communications, attachments, drafts, or deleted emails. Need to know what was said in our defense in criminal case

Complainant's Signature (Required): Mehdi Moslem

Sayed Moslem #263004
PO Box 10
Valhalla, NY 10595

WESTCHESTER NY 105

29 JUN 2022 PM 4 L



US Courthouse
Attn: Cathy Seitel Chambers
300 Quarropas St
White Plains, NY 10601

JSM
SDNY
WP

10601-415099



Letter #1

Saeed Mostern
PO Box 10
Valhalla, Ny 10595

WESTCHESTER NY 105

29 JUN 2022 PM 1 L



US Courthouse
Attn: Cathy Seibel Chambers
300 Quarropas St
White Plains, Ny 10601

USMP
SDNY

10601-415099



Letter #2